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Attorney for Defendants
Municipality of Anchorage
Anchorage Police Department
Walt Monegan
Officers Voss and Henikman

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ALASKA

CAROLYN MITCHELL,)	
)	
Plaintiff,)	
)	
vs.)	
)	
ANCHORAGE POLICE DEPARTMENT and)	
the MUNICIPALITY OF ANCHORAGE, a)	
municipal corporation, WALTER MONEGAN,)	
Officer HENIKMAN, and Officer J. VOSS,)	
)	
Defendants.)	Case No. 3:05-cv-00273-JWS
_____)	

STIPULATION TO ADJUST PRE-TRIAL DEADLINES

The parties, through their respective counsel, stipulate and agree to adjust discovery and pre-trial deadlines, with this Court's approval. The requested adjustments go beyond those which the Court recently ordered (Dkt. 38). The parties seek these further adjustments because Defendant Voss was out of town; APD personnel designated to gather information

responsive to pending discovery were delayed by illness; and the parties desired more time to prepare Motions. The proposed new deadlines are as follows:

December 18, 2006 – Last day to respond to outstanding discovery.

December 18, 2006 – Last day to depose Officer Voss.

January 18, 2007 – All motions.

A proposed Order is submitted herewith.

Respectfully submitted this 6th day of December, 2006.

By: s/ Moshe C. Zorea (consent given)
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Respectfully submitted this 6th day of December, 2006.

By: s/ Isaac Derek Zorea (consent given)
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Respectfully submitted this 6th day of December, 2006.

FREDERICK H. BONESS
Municipal Attorney

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The undersigned hereby certifies that on 12/06/06 a true and correct copy of the *Joint Motion to Adjust Pre-Trial Deadlines & Proposed Order* was served on:

Isaac D. Zorea

Moshe C. Zorea

by first class regular mail, if noted above, or by electronic means through the ECF system as indicated on the Notice of Electronic Filing.

s/ Sheri Curro
Sheri Curro, Legal Secretary
Municipal Attorney's Office